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Amazon.com, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LEON SANTORE and CYNTHIA SANTORE,)	
h/w,)	Civil Action No: _____
)	
Plaintiffs,)	
)	
v.)	
)	
AMAZON.COM, INC., POWEREXTRA d/b/a)	
SHENZHEN CENTER POWER TECH, LLC)	
(a subsidiary of SHENZHEN INDUSTRIES),)	
SHENZHEN-AMERICAS TRADING)	
COMPANY, LLC, JANE DOE 1-5, Fictitious)	
Persons, XYZ CORPORATIONS 1-5, Fictitious)	
Corporations (fictitious names pursuant to <u>R.</u>)	
4:26-4), jointly, severally and in the alternative,)	
)	
Defendants.)	

DECLARATION OF VINCENT LODATO
IN SUPPORT OF NOTICE OF REMOVAL

VINCENT LODATO, under penalty of perjury, hereby declares as follows:

1. I am Of Counsel at Sills Cummis & Gross P.C., counsel for Defendant Amazon.com, Inc. (“Amazon”) in this action. I submit this Declaration in support of Amazon’s Notice of Removal.

2. On January 12, 2023, I accessed the Delaware Secretary of State Division of Corporation's website (www.corp.delaware.gov) and conducted a search for information regarding Shenzhen-Americas Trading Company, LLC ("Shenzhen-Americas"). The website does not identify any of the members of Shenzhen-Americas, but it identifies a registered agent with an address in Delaware. Attached as Exhibit A is a true and correct copy of the results of my search of the Delaware Secretary of State Division of Corporation's website related to Shenzhen-Americas.

3. Through the Delaware Secretary of State Division of Corporation's website, I was able to obtain a copy of the Certificate of Formation that Shenzhen-Americas filed on January 25, 2016. The Certificate of Formation does not identify any of the members of Shenzhen-Americas. Attached as Exhibit B is a true and accurate copy of the Certificate of Formation filed by Shenzhen-Americas.

4. On January 12, 2023, I ran several searches through Westlaw for information related to Shenzhen-Americas. A search of Westlaw's company investigator database for Shenzhen-Americas revealed a business address in Plano, Texas. The database did not identify any of the members of Shenzhen-Americas. Attached as Exhibit C is a true and accurate copy of the results from my search of Westlaw's company investigator database for Shenzhen-Americas. Additional searches of other Westlaw databases did not reveal any information regarding the members of Shenzhen-Americas.

5. On January 12, 2013, I also ran a search of PACER and Google related to Shenzhen-Americas. Those searches did not reveal any information regarding the members of Shenzhen-Americas.

6. Despite a diligent search of publicly available information, I was unable to locate any documents or information identifying the members of Shenzhen-Americas. During my searches, I did not come across any documents or information that any members of Shenzhen-Americas resided in or had any connection to New Jersey

I declare under penalty of perjury under the laws of the United States that the foregoing statements are true and correct.

Dated: January 17, 2023

s/ Vincent Lodato
VINCENT LODATO

EXHIBIT A

Department of State: Division of Corporations

[Allowable Characters](#)

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number: **5946250** Incorporation Date / **1/25/2016**
Formation Date: (mm/dd/yyyy)

Entity Name: **SHENZHEN-AMERICAS TRADING COMPANY, LLC**

Entity Kind: **Limited Liability Company** Entity Type: **General**

Residency: **Domestic** State: **DELAWARE**

REGISTERED AGENT INFORMATION

Name: **WORLDWIDE INCORPORATORS LTD.**

Address: **3411 SILVERSIDE RD STE 104 TATNALL BLDG**

City: **WILMINGTON** County: **New Castle**

State: **DE** Postal Code: **19810**

Phone: **302-477-0500**

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like ☐ Status ☐ Status, Tax & History Information

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EXHIBIT B

CERTIFICATE OF FORMATION
OF
Shenzhen-Americas Trading Company, LLC

The undersigned, being an authorized person for purposes of executing this Certificate of Formation on behalf of Shenzhen-Americas Trading Company, LLC, a Delaware Limited Liability Company (the "L.L.C."), desiring to comply with the requirements of 6 Del.C. Section 18-201 and the other provisions of the Delaware Limited Liability Company Act, 6 Del.C. Section 18-101, et seq. (the "Act"), hereby certifies as follows:

1. Name of the L.L.C. - The name of the L.L.C. is: Shenzhen-Americas Trading Company, LLC.
2. Registered Office and Registered Agent of the L.L.C. - The name of the registered agent for service of process on the L.L.C. in the State of Delaware is Agents and Corporations, Inc. The address of the registered agent of the L.L.C. and the address of the registered office of the L.L.C. in the State of Delaware is 1201 Orange Street, Suite 600, Wilmington, DE 19801.
3. Date of Formation and Effective Date - The date of formation and the effective date of the L.L.C. shall be the date of filing of this Certificate of Formation with the Secretary of State of the State of Delaware.

IN WITNESS WHEREOF, the undersigned hereby executes this Certificate of Formation in accordance with the provisions of 6 Del.C. Section 18-201 on January 25, 2016.

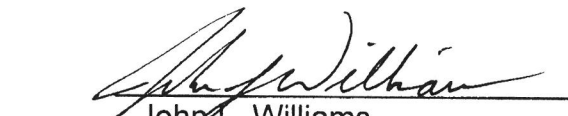

John L. Williams
(Authorized Person)

EXHIBIT C

(11 Records)

- Business Overview (1)
- Phone Numbers (1)
- Businesses with Same Address (1)
- People with Same Address (2)
- Quick Analysis Flags (1)
- Associate Analytics Chart (1)
- Background Information
- D&B Market Identifier Records Summary (1)
- D&B Worldbase Summary (1)
- Full-Text Documents
- D&B Market Identifier Records (1)
- D&B Worldbase (1)
- Miscellaneous
- Report Section(s) with no Matches (95)

Business Overview (1 Section)



Address:	1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306
Phone Number:	(469) 250-0210
Additional Entity Source(s):	D&B Market Identifiers (DMI) D&B Worldbase
Active Ticker Symbols:	
Inactive Ticker Symbols:	
DUNS:	11-774-1401
Number of Employees:	2

Phone Numbers (1 Record)

Business	Phone Number
SHENZHEN-AMERICAS TRADING COMPANY, LLC	(469) 250-0210

D&B Market Identifier Records Summary (1 Record)

	Business Name	Business Address	Executive Name	SIC Description	Latest Update to Record	View Full-Text
1.	SHENZHEN-AMERICAS TRADING COMPANY, LLC	1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306		CUSTOM COMPUTER PROGRAMMING SERVICES, NSK	07/25/2021	Full-Text

D&B Worldbase Summary (1 Record)

	Business Name	Business Address	View Full-Text
1.	SHENZHEN-AMERICAS TRADING COMPANY, LLC	1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306USA	Full-Text

Businesses with Same Address (1 Record)

1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306

PLANO INSPECTION CO INC		
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People with Same Address (2 Records)

1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306

DOROTHY WILLIAMSON	FRED BRADFORD	
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1308 CAPITAL AVE PLANO, TX 75074

LEE WILLIAMSON	DOROTHY WILLIAMSON	IDA DOWNS
JAMES STOVER	FRED BRADFORD	ROBERT SPARKS
DANIEL DOSSEY	CHRISTIAN MCGOVERN	GREGORY MANDERSCHIED
CHARLES STAPLETON		

Quick Analysis Flags (1 Chart)

List of Possible Quick Analysis Flags

OFAC listing:	No
Global Sanctions:	No
Business Address Used as Residential Address:	YES
P.O. Box listed as Address:	No
Bankruptcy Debtor or Creditor:	No
Other Listings Linked to Business Phone Number:	YES
Other Businesses Linked to the Business Address:	YES
Other Businesses Linked to Same FEIN:	No
Key Nature of Suit:	No
Party to a Class Action last 12 months:	No

Going Concern:	No
MSB listing:	No
Healthcare Sanction:	No

Associate Analytics Chart (1 Chart)

Associates	Address	Address Type	Strength/Type of Association	Global Sanctions?	OFAC?
SATCO	1308 CAPITAL AVE STE 7 PLANO, TX 75074	High Rise	Possible Relationship	No	No
PLANO INSPECTION CO INC	1308 CAPITAL AVE STE 7 PLANO, TX 1306	High Rise	Shared Business Name	No	No
SHENZHEN- AMERICAS TRADING COMPANY, LLC	1308 CAPITAL AVE STE 7 PLANO, TX 75074	High Rise	Shared Business Name	No	No

D&B Market Identifier Records (1 Record)

[To Summary](#)

1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306

Business Information

Business Name:	SHENZHEN-AMERICAS TRADING COMPANY, LLC	Related Names:	SATCO
Business Address:	1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306	County:	COLLIN
Year Started:	2016	Phone:	(469) 250-0210
Line of Business:	CUSTOM COMPUTER PROGRAMING		

SIC Information

Primary SIC:	7371	SIC Description:	CUSTOM COMPUTER PROGRAMMING SERVICES, NSK
Primary SIC:	7371 0300	SIC Description:	COMPUTER SOFTWARE DEVELOPMENT AND APPLICATIONS

Financial Information

Annual Sales:	\$46,164-ESTIMATED	Annual Sales Revision Date:	Annual Sales Revision Date:07/30/2022
1-Yr-Ago:	\$ NOT AVAILABLE	3-Yr-Ago:	\$ NOT AVAILABLE
Sales Growth:	%		
MSA Code:	1920	MSA Name:	DALLAS, TX
		Industry Group:	SERVICES - NON PROFESSIONAL

Employee Information

Employees Total:	2	Employees Here:	2-ESTIMATED
1-Yr-Ago:	NOT AVAILABLE	Employment Growth:	%
3-Yr-Ago:	NOT AVAILABLE		

Other Information

DUNS:	11-774-1401		
Business Is A:	SINGLE LOCATION CORPORATION SMALL BUSINESS	Establishment Is:	US OWNED
Last Update to Record:	07/25/2021		

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D&B Worldbase (1 Record)

[To Summary](#)

Business Information

Business Name:	SHENZHEN-AMERICAS TRADING COMPANY, LLC	Secondary Business Name:	SATCO
Business Address:	1308 CAPITAL AVE STE 7 PLANO, TX 75074-1306	Mailing Address:)
County:	COLLIN		
Country:	USA		
Continent:	NORTH AMERICA	Continent:	0
Phone Number:	(469) 250-0210		
Year Started:	2016	Operating Status:	ACTIVE
Duns ID:	11-774-1401		
Last Update to Record:	07/24/2021		

Management Team

Business Details

Line of Business:	CSTM CMPTR PRGMG SV		
Primary SIC:	7371	Primary SIC Description:	CUSTOM COMPUTER PROGRAMING
Total Employees:	4-MODELED*	Employees Here:	4-MODELED
	*PRINCIPALS NOT INCLUDED IN TOTAL		

Financial Information

Net Worth US:	NOT AVAILABLE	Profit US:	NOT AVAILABLE
Net Worth Local:	NOT AVAILABLE	Profit Local:	NOT AVAILABLE
Currency:	U.S. DOLLAR		

Sales Information

Annual Sales US:	\$46,164-MODELED	Annual Sales Local:	\$NOT AVAILABLE
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Company History/Operations/Relationships & Other Information

This Company's Specifics			
DUNS:	11-774-1401		
Legal Status:	CORPORATION		
Ownership Is:	PRIVATELY OWNED		
Business Is A:	SINGLE LOCATION		

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Report Section(s) with no Matches (95 Records)

Full Business Description (SEC Filings), FEIN Records Summary, Business Finder Records Summary, Business Profile Records Summary, Corporate Filings Summary, Marijuana-Related Business Records Summary, Fictitious Business Names Summary, Money Service Business Records Summary, NPI Records Summary, News, Businesses with Same Phone Number, People with Same Phone Number, Executive Affiliations Summary, Executive Biographies Summary, Executive Profile Records Summary, Professional Licenses Summary, Beneficial and Management Ownership (SEC Filings), Listing of Officers and Directors (SEC Filings), Legal Advisors, Financial Advisors, Matters Related to Accountants and Financial Statements (SEC Filings), FAA Aircraft Registrations Summary, Real Property Pre-Foreclosure Records Summary, Real Property Tax Assessor Records Summary, Real Property Transactions Summary, Watercraft Summary, Bankruptcy Records Summary, Bankruptcy or Receivership (SEC Filings), UCC Filings Summary, Liens & Judgments Summary, Criminal Records Summary, Arrest Records Summary, Global Sanctions Summary, OFAC Infractions Summary, Healthcare Sanctions Summary, Company Disclosed Risk Factors (SEC Filings), Lawsuit Records Summary, Federal Case Law, State Case Law, Docket Records, Company Disclosed Legal Proceedings (SEC Filings), SEC Filings, SEC Insider Filings, Subsidiaries Disclosed in SEC Filings, SEC Staff Review Letters, SEC No Action Letters, Registrations & Prospectuses Transactions, Controls and Procedures (SEC Filings), Quantitative and Qualitative Discussions About Market Risk (SEC Filings), Material Modifications to Rights of Security Holders (SEC Filings), Unregistered Sales of Equity Securities (SEC Filings), Notice of Delisting Failure to Satisfy Listing Rule or Transfer of Listing (SEC Filings), SEDAR Filings, Mergers & Acquisitions Transactions, Mergers & Acquisitions Agreements, Business Organization Agreements, Capital Market Agreements, Corporate Finance Agreements, Private Equity Agreements, Intellectual Property Agreements, Other Material Agreements, Entry or Termination of a Material Definitive Agreement (SEC Filings), Changes in Control of Registrant (SEC Filings), Relationships and Related Transactions (SEC Filings), Financials - Annual, Ratios, Company Profile, Executive Officers, Folder Content, Lawsuit Records, Bankruptcy Records, UCC Filings, Liens & Judgments, Criminal Records, Arrest Records, Global Sanctions, OFAC Infractions, Healthcare Sanctions, FAA Aircraft Registrations, Real Property Pre-Foreclosure Records, Real Property Tax Assessor Records, Real Property Transactions, Watercraft, Executive Affiliations, Executive Biographies, Executive Profile Records, Professional Licenses, FEIN Records, Business Finder Records, Business Profile Records, Corporate Filings, Marijuana-Related Business Records, Fictitious Business Names, Money Service Business Records, NPI Records